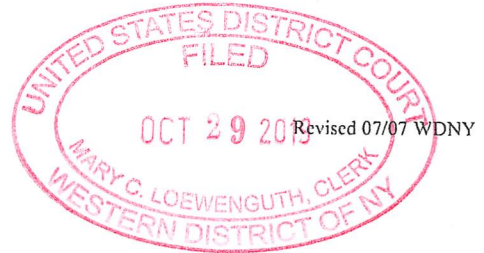


UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK



Brianna Bandle

Jury Trial Demanded: Yes ☐ No ☐

Name(s) of Plaintiff or Plaintiffs

-VS-

Conduent
Benny Bridgewater,
Continuum Global Solutions, LLC

Name of Defendant or Defendants

DISCRIMINATION COMPLAINT

19-CV 6797 FPG

You should attach a copy of your **original Equal Employment Opportunity Commission (EEOC) complaint**, a copy of the Equal Employment Opportunity Commission **decision**, **AND** a copy of the **"Right to Sue"** letter you received from the EEOC to this complaint. Failure to do so may delay your case.

Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.

This action is brought for discrimination in employment pursuant to (check only those that apply):

☐ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub.L.No. 102-166) (race, color, gender, religion, national origin).

NOTE: In order to bring suit in federal district court under Title VII, you **must first obtain a right to sue letter** from the Equal Employment Opportunity Commission.

☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621-634 (amended in 1984, 1990, and by the Age Discrimination in Employment Amendments of 1986, Pub.L.No. 99-592, the Civil Rights Act of 1991, Pub.L.No. 102-166).

NOTE: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you **must first file charges** with the Equal Employment Opportunity Commission.

☐ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112-12117 (amended by the Civil Rights Act of 1991, Pub.L.No. 102-166).

NOTE: In order to bring suit in federal district court under the Americans with Disabilities Act, you **must first obtain a right to sue letter** from the Equal Employment Opportunity Commission.

JURISDICTION is specifically conferred upon this United States District Court by the aforementioned statutes, as well as 28 U.S.C. §§ 1331, 1343. Jurisdiction may also be appropriate under 42 U.S.C. §§ 1981, 1983 and 1985(3), as amended by the Civil Rights Act of 1991, Pub.L.No. 102-166, and any related claims under New York law.

In addition to the federal claims indicated above, you may wish to include New York State claims, pursuant to 28 U.S.C. § 1367(a).

_____ New York State Human Rights Law, N.Y. Exec. Law §§ 290 to 297 (age, race, creed, color, national origin, sexual orientation, military status, sex, disability, predisposing genetic characteristics, marital status).

PARTIES

1. My address is: 200 Ellicott St Rochester, NY 14619

My telephone number is: 585 524 6112 or 585 498 9790

2. The name of the employer(s), labor organization, employment agency, apprenticeship committee, state or local government agency who I believe discriminated against me is/are as follows:

Name: Conduent, Benny Ridgeway, continuum global solutions LLC.

Number of employees: fifty plus employees

Address: 1 medley center way, Irondequoit, NY 14622

3. (If different than the above), the name and/or the address of the defendant with whom I sought employment, was employed by, received my paycheck from or whom I believed also controlled the terms and conditions under which I were paid or worked. (For example, you worked for a subsidiary of a larger company and that larger company set personnel policies and issued you your paycheck).

Name: _____

Address: _____

CLAIMS

4. I was first employed by the defendant on (date): 6-26-18

5. As nearly as possible, the date when the first alleged discriminatory act occurred is: (Days after Benny Ridgeway was appointed supervisor.)
6. As nearly as possible, the date(s) when subsequent acts of discrimination occurred (if any did): 7-10-18, 7-14-18, 7-24-18, 7-28-18 (etc.)
*some are hard to identify due to management deleting notes I personally documented in my work computer regarding the specific incidents.
7. I believe that the defendant(s)
- a. Are still committing these acts against me.
- b. / Are not still committing these acts against me.
- (Complete this next item **only** if you checked "b" above) The last discriminatory act against me occurred on (date) July 27, 2018
8. (Complete this section **only** if you filed a complaint with the New York State Division of Human Rights)
- The date when I filed a complaint with the New York State Division of Human Rights is _____
 _ (estimate the date, if necessary)
- I filed that complaint in (identify the city and state): _____
- The Complaint Number was: _____
9. The New York State Human Rights Commission did _____ /did not _____ issue a decision. (NOTE: If it **did** issue a decision, you **must attach** one copy of the decision to **each** copy of the complaint; failure to do so will delay the initiation of your case.)
10. The date (if necessary, estimate the date as accurately as possible) I filed charges with the Equal Employment Opportunity Commission (EEOC) regarding defendant's alleged discriminatory conduct is: December 6, 2018
11. The Equal Employment Opportunity Commission did did /did not _____ issue a decision. (NOTE: If it **did** issue a decision, you **must attach** one copy of the decision to **each** copy of the complaint; failure to do so will delay the initiation of your case.)
12. The Equal Employment Opportunity Commission issued the attached Notice of Right to Sue letter which I received on: July 31, 2019. (NOTE: If it

did issue a Right to Sue letter, you **must attach** one copy of the decision to **each** copy of the complaint; failure to do so will delay the initiation of your case.)

13. I am complaining in this action of the following types of actions by the defendants:

- a. _____ Failure to provide me with reasonable accommodations to the application process
- b. _____ Failure to employ me
- c. / Termination of my employment
- d. _____ Failure to promote me
- e. _____ Failure to provide me with reasonable accommodations so I can perform the essential functions of my job
- f. / Harassment on the basis of my sex
- g. / Harassment on the basis of unequal terms and conditions of my employment
- h. / Retaliation because I complained about discrimination or harassment directed toward me exact result/reason
- i. _____ Retaliation because I complained about discrimination or harassment directed toward others others are/were involved
- j. / Other actions (please describe) failure of investigation handling the issue, unclear protection internally and when hired.

14. Defendant's conduct is discriminatory with respect to which of the following (check all that apply):

- a. _____ Race
- b. _____ Color
- c. / Sex
- d. _____ Religion
- e. _____ National Origin
- f. / Sexual Harassment
- g. _____ Age
_____ Date of birth
- h. _____ Disability
Are you incorrectly perceived as being disabled by your employer?
_____ yes _____ no

15. I believe that I was was/was not _____ intentionally discriminated against by the defendant(s).

16. I believe that the defendant(s) is/are _____ is not/are not are ~~not~~ still committing these acts against me. (If you answer is that the acts are not still being committed, state when: 7-26-18 and why the defendant(s) stopped committing these acts against you: I was retaliated against and lied on after reporting my supervisor Benny Bridgeway and after he found out I reported him and the acts to H.R. and other management.
17. A copy of the charge to the Equal Employment Opportunity Commission is attached to this complaint and is submitted as a brief statement of the facts of my claim. (NOTE: You must attach a copy of the original complaint you filed with the Equal Employment Opportunity Commission and a copy of the Equal Employment Opportunity Commission affidavit to this complaint; failure to do so will delay initiation of your case.)
18. The Equal Employment Opportunity Commission (check one):
 _____ has not issued a Right to sue letter
/ has issued a Right to sue letter, which I received on 7-31-19
19. State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.) & attached Statement

Benny Bridgeway (supervisor) retaliated against me after putting me in a very uncomfortable, threatening and intolerable situation(s) & position(s) when Harassing and bothering me on almost / just about a daily basis. with touching, remarks & retaliation using his authority over my employment. After I reported the claims to H.R. and Benny oversaw notes about him I put in my Computer, he then created a false lie to try & get me fired which he had no proof on. I was asked to arbitrate the issue and offered a job back in the same hostile environment.

FOR LITIGANTS ALLEGING AGE DISCRIMINATION

20. Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct
 _____ 60 days or more have elapsed _____ less than 60 days have elapsed


FOR LITIGANTS ALLEGING AN AMERICANS WITH DISABILITIES ACT CLAIM

21. I first disclosed my disability to my employer (or my employer first became aware of my disability on _____)

22. The date on which I first asked my employer for reasonable accommodation of my disability is _____
23. The reasonable accommodations for my disability (if any) that my employer provided to me are: _____
24. The reasonable accommodation provided to me by my employer were ____/were not ____ effective.

WHEREFORE, I respectfully request this Court to grant me such relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

Dated: 10-25-19


Plaintiff's Signature



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
Buffalo Local Office

300 Pearl St, Suite 450
Buffalo, NY 14202
Intake Information Group: (800) 669-4000
Intake Information Group TTY: (800) 669-6820
Buffalo Direct Dial: (716) 431-5007
TTY (716) 551-5923
FAX (716) 551-4387
Website: www.eeoc.gov

Charging Party

Brianna Randle
25 Lexington Ct.#28
Rochester, NY 14606

Charge No: 525-2019-00008

Respondent

Continuum Global Solutions, LLC
1 Medley Center Way
Irondequoit, NY 14622

DETERMINATION

On behalf of the U.S. Equal Employment Opportunity Commission ("Commission"), I issue the following determination on the merits of the subject charge filed under Title VII of the Civil Rights Act of 1964 (Title VII) as amended. Respondent is an employer within the meaning of the statutes. All requirements for coverage have been met.

Charging Party, a female hired as a Customer Service Representative II, alleged that she was subjected to repeated unwelcome advances of a sexual nature from Benny Ridgeway, Manager. Charging Party also alleged that she reported the sexual harassment, but Respondent failed to take effective action. Finally, Charging Party alleged that she was terminated in retaliation for having complained about discrimination.

Respondent, a call center, denied that the conduct that Charging Party complained about constituted sexual harassment, and that that Charging Party was terminated for insubordination, performance, and attendance issues.

The Commission's reviewed all evidence provided. The investigation failed to confirm that Charging Party was subjected to sexual advances that rose to the level of a hostile work environment. In addition, the record shows that Charging Party incurred in performance and attendance issues which resulted in her employment termination.

However, information gathered during the investigation revealed that Charging Party and other employees were required to sign an agreement that contains unclear language giving the impression that all employment disputes are to be settled by binding arbitration. The Agreement signed by employees does not clearly state that "nothing in that agreement is intended to interfere with employees right to file a charge of discrimination with the EEOC." In fact, Respondent's position statement dated May 8, 2019 indicates that Respondent "...denies that the Commission has jurisdiction over this matter as Charging Party signed an agreement to arbitrate disputes pertaining to her employment."

Based on the above, I have determined that the evidence obtained during the investigation does not establish a violation of Title VII with respect to sexual harassment, employment termination, and retaliation. This letter will be the only notice of the Charging Party's right to sue sent by the Commission with respect to her sexual harassment, employment termination, and retaliation claims under Title VII. Following this dismissal, the Charging Party may only pursue her retaliation allegation under Title VII by filing suit against the Respondent named in the Charge within ninety (90) days of receipt of this letter. Otherwise, the Charging Party right to sue on these issues will be lost.

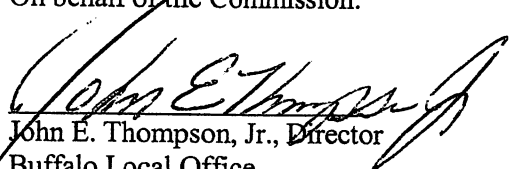
However, Respondent's asserted defense does not withstand scrutiny and the Commission has determined that there is reasonable cause to believe that Respondent has violated EEOC laws by requiring its employees to sign an agreement that contains unclear language and appears to require employment disputes to be settled by binding arbitration and discouraging employees from filing a charge of discrimination with the EEOC.

This determination is final. Title VII requires that, if the Commission determines that there is reasonable cause to believe that a violation has occurred, it shall endeavor to eliminate the alleged unlawful employment practices by informal methods of conference, conciliation, and persuasion. Having determined that there is reason to believe that violations have occurred, the Commission now invites Respondent to join with it in an effort toward a just resolution of this matter.

Disclosure of information obtained by the Commission during the conciliation process may only be made in accordance with Title VII and the Commission's Procedural Regulations. The confidentiality provisions of Section 107 of Title VII and Commission Regulations apply to information obtained during conciliation.

If Respondent declines to enter into conciliation discussions, or when the Commission's representative is unable to secure an acceptable conciliation agreement, the Director shall so inform the parties, advising them of the court enforcement alternatives available to aggrieved persons and the Commission.

On behalf of the Commission:


John E. Thompson, Jr., Director
Buffalo Local Office

JUL 31 2019
Date

CC: Nicole S. Adler
The Kullman Firm
1100 Poydras St., Suite 1600
New Orleans, Louisiana 70163

EEOC PARTICIPATION		CHARGE OF DISCRIMINATION	
<small>This form is subject to the Privacy Act of 1974. See enclosed Privacy Act Statement and cover information before completing this form.</small>		Charge Presented To: <input type="checkbox"/> EEOC <input checked="" type="checkbox"/> HEPA 525-2019-00008 and EEOC	
Name (include Mr., Mrs., Mx.): Miss Brianna Randle			
Street Address: 25 Lexington Ct., #28, Rochester, NY 14606		City, State and ZIP Code: 585-524 6112	
Name: CONDUCENT		No. Employees, Members: Unknown	
Street Address: 1 Medley Center Way, Irondequoit, NY 14622		Phone No. (include Area Code): (901) 567-5490	
Name: Medley		No. Employees, Members: Unknown	
Street Address: Medley Center Way, Irondequoit, NY 14622		Phone No. (include Area Code): (901) 567-5490	
City, State and ZIP Code: 585-524 6112		Date of Birth: 1992	
DISCRIMINATION BASED ON (check appropriate boxes): <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input checked="" type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input checked="" type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify):			
THE PARTICULARS ARE (if additional pages are needed, attach extra sheets): I am a female. I worked for Respondent since on or about June 26, 2018. My last position was Customer Service Representative II.			
One of the trainers was Benny Ridgeway (male supervisor). Shortly after I began my training, Mr. Ridgeway made unwelcome sexual approaches to me. For example, he would rub my hand, grabbed my waist, and made sexual grunts. Other employees such as my brother (Willie Webb) who also worked for Respondent witnessed the harassment I was subjected to. In fact, on or about July 11, 2018, my brother witnessed when Mr. Ridgeway inappropriately held my hand for a long time, so my brother referred to Mr. Ridgeway as a "creep." In retaliation, my brother was terminated on or about July 11, 2018. I received an unfair write-up on July 24, 2018. I finally reported the sexual harassment to Ethlos on or about July 25, 2018. I was also warned by a female coworker that Mr. Ridgeway was searching for information in my work computer, and that it seems he was looking for a reason to terminate my employment. I had saved the complaint against him in my work computer. The following date, I was terminated. I believe that I was sexually harassed and terminated in retaliation for having complained about discrimination, in violation of Title VII of the Civil Rights Act of 1964, as amended.			
I want this charge filed with both the EEOC and the State or Local Agency. If any, I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - (When necessary for State and Local Agency Requirements)	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	
Date: 11/6/18 Charging Party Signature: <i>Brianna Randle</i>		SIGNED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	

EEOC Form 5 (11/09)

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: Agency(ies) Charge No(s): <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div> <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC </div> <div style="text-align: right;"> 525-2019-00008 </div> </div>	
New York State Division Of Human Rights and EEOC <i>State or local Agency, if any</i>			
Name (Indicate Mr., Ms., Mrs.) Miss Brianna Randle		Home Phone (Incl. Area Code) (585) 498-9740	Date of Birth 1992
Street Address City, State and ZIP Code 25 Lexington Ct., #28, Rochester, NY 14606			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name CONDUENT		No. Employees, Members Unknown	Phone No. (Include Area Code) (801) 567-5490
Street Address City, State and ZIP Code 1 Medley Center Way, Irondequoit, NY 14622			
Name		No. Employees, Members	Phone No. (Include Area Code)
Street Address City, State and ZIP Code			
DISCRIMINATION BASED ON (Check appropriate box(es).) <div style="display: flex; flex-wrap: wrap; padding: 5px;"> <div style="margin-right: 10px;"><input type="checkbox"/> RACE</div> <div style="margin-right: 10px;"><input type="checkbox"/> COLOR</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> SEX</div> <div style="margin-right: 10px;"><input type="checkbox"/> RELIGION</div> <div style="margin-right: 10px;"><input type="checkbox"/> NATIONAL ORIGIN</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> RETALIATION</div> <div style="margin-right: 10px;"><input type="checkbox"/> AGE</div> <div style="margin-right: 10px;"><input type="checkbox"/> DISABILITY</div> <div style="margin-right: 10px;"><input type="checkbox"/> GENETIC INFORMATION</div> <div style="margin-right: 10px;"><input type="checkbox"/> OTHER (Specify)</div> </div>			DATE(S) DISCRIMINATION TOOK PLACE <div style="display: flex; justify-content: space-between;"> <div> Earliest 06-26-2018 </div> <div> Latest 07-26-2018 </div> </div> <div style="text-align: center; margin-top: 10px;"> <input type="checkbox"/> CONTINUING ACTION </div>
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): <p>I am a female. I worked for Respondent since on or about June 26, 2018. My last position was Customer Service Representative II.</p> <p>One of the trainers was Benny Ridgeway (male supervisor.) Shortly after I began my training, Mr. Ridgeway made unwelcome sexual approaches to me. For example, he would rub my hand, grabbed my waist, and made sexual grunts. Other employees such as my brother (Willie Webb) who also worked for Respondent witnessed the harassment I was subjected to. In fact, on or about July 11, 2018, my brother witnessed when Mr. Ridgeway inappropriately held my hand for a long time, so my brother referred to Mr. Ridgeway as a "creep." In retaliation, my brother was terminated on or about July 11, 2018. I received an unfair write-up on July 24, 2018. I finally reported the sexual harassment to Ethics on or about July 25, 2018. I was also warned by a female coworker that Mr. Ridgeway was searching for information in my work computer, and that it seems he was looking for a reason to terminate my employment. I had saved the complaint against him in my work computer. The following date, I was terminated. I believe that I was sexually harassed and terminated in retaliation for having complained about discrimination, in violation of Title VII of the Civil Rights Act of 1964, as amended.</p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures. I declare under penalty of perjury that the above is true and correct.		NOTARY – When necessary for State and Local Agency Requirements I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	
_____ Date		_____ Charging Party Signature	

CP Enclosure with EEOC Form 5 (11/09)

PRIVACY ACT STATEMENT: Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

1. **FORM NUMBER/TITLE/DATE.** EEOC Form 5, Charge of Discrimination (11/09).
2. **AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
3. **PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
4. **ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
5. **WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

NOTICE OF NON-RETALIATION REQUIREMENTS

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.

19 CV 6797 FPG

JS 44 (Rev. 08/18)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Brianna Randle

(b) County of Residence of First Listed Plaintiff

monroe

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Pro Se

DEFENDANTS

Conduent, Benny
Ridgeway, Continuum
Global Solutions, LLC

County of Residence of First Listed Defendant

monroe

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)



II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

42 U.S.C. § 2000e-5 and Title VII

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

10-25-19

SIGNATURE OF ATTORNEY OF RECORD

(Pro Se)

Brianna Randle

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____